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DOCKET FILE COPY ORIGINAL

July 31, 1998

Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20054

Re:

MM Docket No. 87-268 WTVJ(TV), Miami, FL Request for Extension of Time

Dear Ms. Salas:

NBC Stations Management, Inc. ("NBC"), licensee of WTVJ, Miami, FL, respectfully requests an extension of time to submit its application for a construction permit for its DTV facilities.

Section 73.624(e) of the FCC's rules requires a licensee to submit its application for a DTV construction permit on or before the halfway mark of its construction period. The deadline for construction of all network affiliated television stations in Miami is November 1, 1999. Accordingly, WTVJ's application for construction permit is due by August 1, 1998. However, for the reasons detailed below, WTVJ is preparing a request to amend the DTV Table of Allotments and Allocations asking that our DTV assignment be modified from Channel 30 to Channel 31 to enable the station to relocate its transmitter site. That request will be filed shortly, and until such time as the FCC acts on that request, WTVJ is not able to prepare a DTV construction permit application.

Due to allocation constraints, WTVJ's NTSC operation on Channel 6 is forced to be located approximately 50 kilometers south of the antenna sites for the other Miami television stations and away from the market's population center. This has placed WTVJ at a competitive disadvantage and has required the station to utilize two television translators stations to improve the quality of its signal in the heavily populated areas of the market.

WTVJ has received assurances from CBS, licensee of WFOR-TV in Miami and owner of a tower in North Dade County that WTVJ can lease space on that tower for its DTV facilities. However, WTVJ's current DTV assignment – Channel 30 -- cannot be accommodated from that site. Accordingly, WTVJ has conducted an engineering analysis and has determined that if DTV Channel 31 is substituted for DTV Channel 30, WTVJ will be able to locate its DTV facilities within the same site as the other Miami stations and

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Ms. Magalie Roman Salas July 31, 1998 Page 2

comply with the relevant FCC rules governing DTV interference. NBC believes that the public interest will be served by this change, which will improve the signal strength of WTVJ-DT and will limit the stations' dependence on translators within the Miami DMA, making the WTVJ-DT operation more spectrally efficient.

NBC intends to file its request to amend the DTV Table of Allotments and Assignments within the next week. We are prepared to file a construction permit application for WTVJ-DT as soon as the Commission acts on that request and to begin construction immediately upon grant of the application in order to meet our November 1, 1999 deadline. Accordingly, we respectfully request an extension of time to file that application until such time as the Commission has acted on our Request to Amend the DTV Table of Allotments and Assignments.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

Diane Zipursky

cc: Roy Stewart

Barbara Kreisman

Keith Larson